UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

UNITED STATES OF AMERICA

v.   CRIMINAL NO.: 2:18CR119

DESMOND LITTLEJOHN,

        Defendant.

DEFENDANT'S PROPOSED JURY INSTRUCTIONS

Pursuant to Local Rule 30, the defendant respectfully requests that the Court

include the following listed jury instructions in its charge:

No.	SUBJECT	AUTHORITY
1.	Defense Theory	Pattern Criminal Jury Instructions
2.	Alibi	Pattern Criminal Jury Instructions

Respectfully submitted,
DESMOND LITTLEJOHN

By: _____/s/_____
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Proposed Jury Instructions was mailed to William Muhr, Esquire, Assistant United States Attorney, Office of the United States Attorney, 101 W. Main Street, Ste 8000, Norfolk, VA 23510 on this 31st day of January, 2019.

_____/s/_____
James O. Broccoletti

DEFENSE THEORY

(1) THAT CONCLUDES THE PART OF MY INSTRUCTIONS EXPLAINING THE ELEMENTS OF THE CRIME. NEXT I WILL EXPLAIN THE DEFENDANT'S POSITION.

(2) THE DEFENSE SAYS THAT HE WAS NOT PRESENT AT THE SCENE OF THE OFFENSE, THEREFORE HE IS NOT GUILTY.

AUTHORITY: Committee on Pattern Criminal Jury Instructions, District Judges Association Pattern Criminal Jury Instructions, 6.01(6th Circuit, 2005 edition)

ALIBI

(1) One of the questions in this case is whether the defendant was present at the time and place of the robbery that occurred on October 9, 2017.

(2) The government has the burden of proving that the defendant was present at the time and place. Unless the government proves this beyond a reasonable doubt, you must fine the defendant not guilty.